EXHIBIT D

JELD-WEN

MANUFACTURERS OF: WOOD WINDOWS AND DOORS • MILLWORK • OTHER BUILDING PRODUCTS

3303 LAKEPORT BLVD. • P.O. BOX 1329 KLAMATH FALLS, OREGON 97601-0268 USA
TELEPHONE 503-882-3451 ADMIN. FAX 503-885-7454 OPER. FAX 503-885-7423

February 11, 1994

TO: State of Washington
Department of Ecology
Northwest Regional Office
Attn: Michael Gallagher
3190 160th Ave. S.E.
Bellvue, WA 98008-5452

RE: Nord Door/JELD-WEN of Everett
300 W. Marine View Drive
Everett, WA 98026

Dear Mr. Gallagher:

With this letter, I would like to formally report the discovery of waste in the environment in excess of Model Toxics Control Act recommended clean-up levels. On November 19, 1993, I received a fax from Huckel/Weinman Associates, Inc. (HWA) outlining the discovery on our industrial site.

JELD-WEN is in the process of leasing a portion of the Everett, WA. facility. Through the independent site review that Huckel/Weinman Associates, Inc. performed, for the prospective lessee, the discovery was made. RZA AGRA, Inc. performed the site assessment under contract to HWA. The package of information was made available to JELD-WEN through the Environmental Impact Statement HWA produced for Sterling Asphalt, the prospective lessee.

The contamination discovered was Total Petroleum Hydrocarbons. One soil sample showed a result of 700 ppm, which exceeds the Model Toxics Control Act recommended level of 200 ppm. This Table 2 Method A Cleanup level is based on protection of ground water.

Two ground water samples produced levels of 16 ppm and 1.6 ppm, which exceeds MTCA levels of 1.0 ppm. The cleanup level indicated is a conservative level, but exceedance in the values indicated in Table 1 of the Method A levels do not necessarily trigger requirements for cleanup action. The indicated cleanup level is based on prevention of adverse aesthetic characteristics. The location of the samples are identified on the enclosed map.

Historical review of the site indicates that this has been a wood products manufacturing plant since early in the century. The site has grown through periodic fill in the Port Gardner tide lands. The latest reclaim occurred in 1978 after an extensive Environmental Impact Statement was received and approved.

By using dated aerial photographs, available from the 1940's to present, there does not appear to be any process which would produce or cause a petroleum contamination. The approximate area of contamination is by the reclaimed portion of the Port Gardner tide lands where, years ago, loading of materials and moorage of boats occurred.

On August 21, 1991 you, as a representative of the Department of Ecology, offered a relative health and environmental risk for this site of a 5: representing the lowest risk. This ranking was based on historical review and site reconnaissance. Parametrix completed their study for the D.O.E. in June of 1991.

There has been no independent action at this time. A review of historical site procedures, previous reports, interviews with employees, and aerial photographs have been done to determine the need for further investigation.

Based on the information available, it does not appear that this discovery is of major impact. The levels of TPH, though in excess of Model Toxics Control Act closure levels which are advisory, based on the occupancy and exposure, should be protective of human health and the environment and closure at such levels should be appropriate.

After review of the attached data and information or if you have need of further information, please contact me. Thank you.

Sincerely yours,

JELD-WEN, inc.

Charles R. Taylor WSO-CSM, CHMS
Safety & Environmental Manager

attachments

wpdoc\johng\ndcontam

cc: Matt Beddoe
Randy Cox

ATTACHMENT A

D.O.E. RANKING AND SUMMARY SCORE SHEET FOR NORD FACILITY

CHRISTINE O. GREGOIRE
Director

STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

Northwest Regional Office, 3190 - 160th Ave S.E. • Bellevue, Washington 98008-5452 • (206) 649-7000

August 21, 1991

Mr. Mike Negrete
Nord Door
300 W. Marine View Drive
Everett, WA 98026

Dear Mr. Negrete:

The Department of Ecology has now assessed the relative health and environmental rick of Nord Door site. A ranking of 5 (with 1 being highest risk and 5 being lowest risk) has been calculated.

For your information, Ecology will be publishing the ranking of this and other sites in the August 27 Site Register. The rankings will be used in conjunction with other considerations in determining Ecology's priority for future actions at sites. It is not anticipated this ranking will affect the current activities at the site.

The site ranking effort is being conducted under the Model Toxics Control Act. A fact sheet on the ranking method is enclosed for your information.

For further information, please contact Judith Aitken at 649-7135.

Sincerely,

Michael Gallagher

Michael Gallagher
Supervisor
Toxics Cleanup Program

MG:cs
Enclosure

8/26/91

RECEIVED
AUG 26 1991
NORD/JELD-WEN

cc: Randy Cox
Stan Meyers
Bill Schauermann

11/23/93

Post-it™ brand fax transmittal memo 7671	# of pages ▸ 4
To JOHN	From MIKE
Co. JELD-WEN	Co. NORD
Dept. SAFETY	Phone #
Fax # (503) 885-7424	Fax # (206) 252-7422

WORKSHEET 1
SUMMARY SCORE SHEET

Site Name/Location (City, County, Section/Township/Range):

NORD DOOR
Everett, Snohomish County

The site is in NE1/4, NE1/4, SE1/4 of Section 7, T29N, R5E.

Site Description (Include management areas, compounds of concern, and quantities):

Nord Door is situated adjacent to the Snohomish on an area of fill. Current processes involve sorting, stacking, drying, planing and cutting lumber and assembling and finishing doors, rails, posts, columns and spindles. They occasionally fabricate their own machinery. No contaminants were found to exceed MTCA levels.

Management Areas Surface and ground soils, and surface water.

Compounds of Concern Acetone, chloroform, and Methylene Chloride.

Quantities Unknown

Special Considerations (Include limitations in site file data or data which cannot be accommodated in the model, but which are important in evaluating the risk associated with the site, or any other factor(s) over-riding a decision of no further action for the site):

None

ROUTE SCORES:

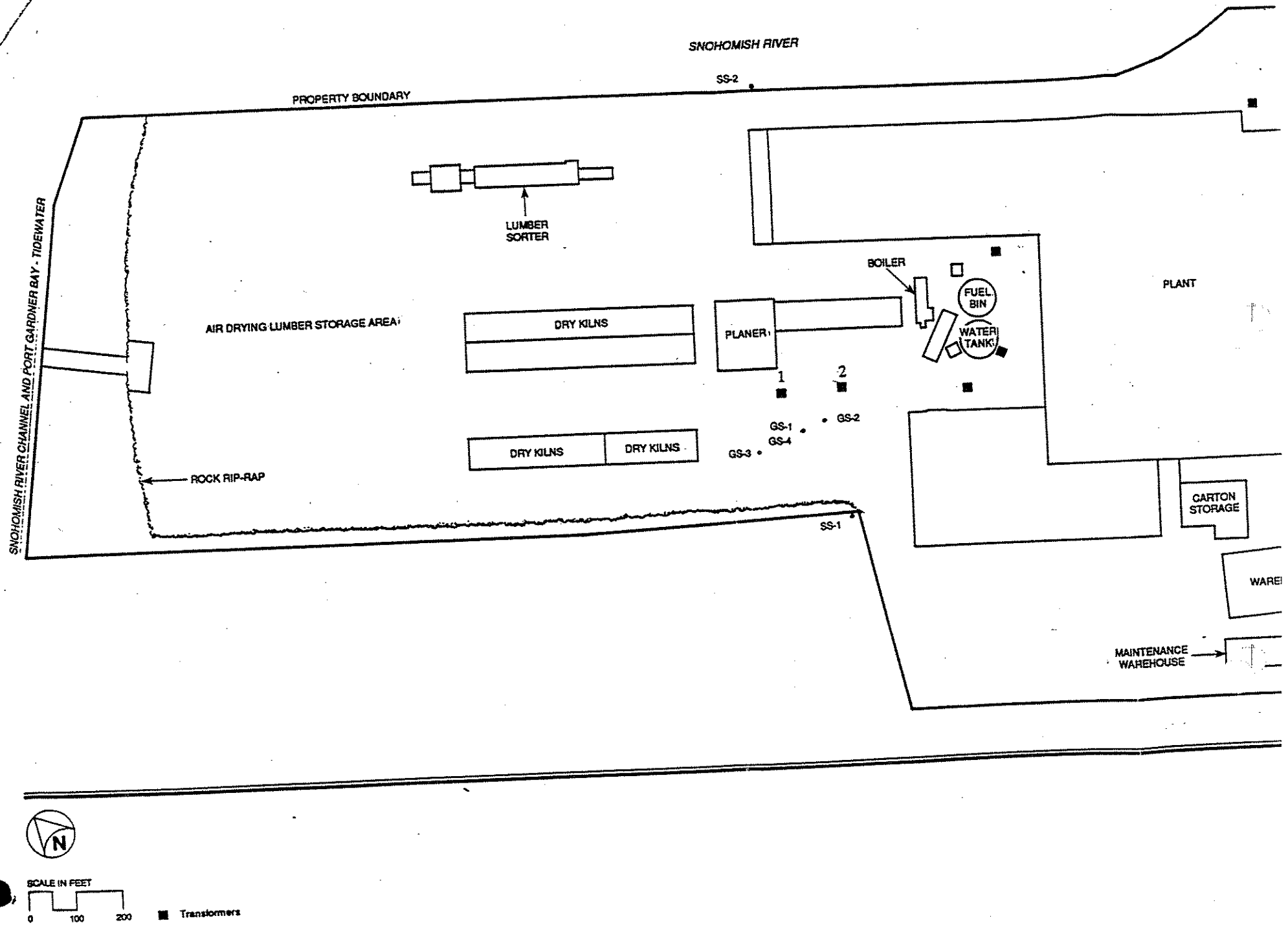
Surface Water/Human Health:	1.8	Surface Water/Environ.:	6.5
Air/Human Health:	7.1	Air/Environmental:	18.9
Ground Water/Human Health:	16.2		

OVERALL RANK: 5

Rev. 5/31/91

ATTACHMENT B

SITE LOCATION OF PARAMETRIX SAMPLE LOCATIONS FOR D.O.E. RISK ASSESSMENT JUNE 1991

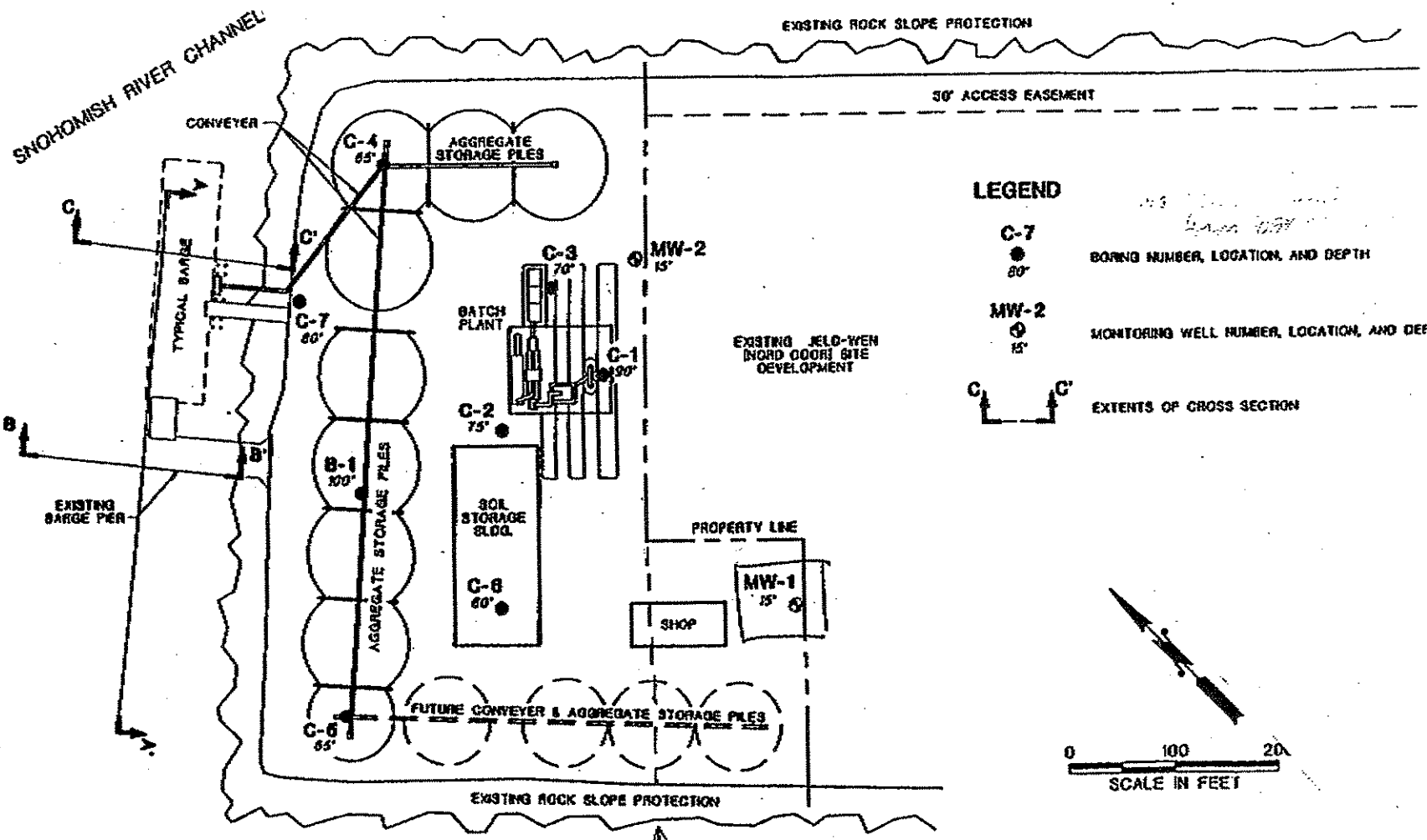

SNOHOMISH RIVER
SS-2
PROPERTY BOUNDARY
SNOHOMISH RIVER CHANNEL AND PORT GARDNER BAY - TIDEWATER
LUMBER SORTER
BOILER
FUEL BIN
WATER TANK
PLANT
AIR DRYING LUMBER STORAGE AREA
DRY KILNS
PLANER
1
2
GS-1
GS-2
GS-4
GS-3
DRY KILNS
DRY KILNS
ROCK RIP-RAP
SS-1
CARTON STORAGE
MAINTENANCE WAREHOUSE
N
SCALE IN FEET
0
100
200
Transformers

ATTACHMENT C

SCHEMATIC OF PROPOSED ASPHALT PLANT.
SOIL AND WATER SAMPLES INDICATED BY MW-1 AND MW-2.
ANALYTICAL:

MW-1
SOIL 700 ppm TPH
GROUNDWATER 16 ppm TPH

MW-2
GROUND WATER 1.2 ppm TPH



RZA AGRA, INC. *Engineering & Environmental Services* 11335 N.E. 122nd Way Suite 100 Kirkland, Washington 98034-6918	W.O. W-8390-2 DESIGN JFG DRAWN MJF DATE SEP 1992 SCALE 1"=100'	STERLING ASPHALT EVERETT, WASHINGTON SITE AND EXPLORATION PLAN FIGURE 2	

DRAWING NO. W8390-2\8E2.DWG

ATTACHMENT D

NARRATIVE AND SCHEMATIC OF 1978 E.I.S. PROPOSED RECLAIM AREA

D Major Physical and Engineering Aspects of the Proposal

Construction Phase I

The first phase of the project involves the placement of 198,800 cubic yards of fill on 11.2 acres of tideland owned by Nord immediately south of the existing factory (See Figures 4, and 5). The Nord Company anticipates obtaining the fill material from Snohomish River channel maintenance dredging. Because of competing uses of these river dredge spoils by the Port of Everett and others, Nord may not be able to utilize dredge spoils for its proposed fill. In this event Nord will be required to find another source of fill material. One possible source of fill may be Nord's own maintenance dredging which it will undertake to keep its recently constructed barge dock in operation. Periodic dredging will be required to maintain a channel for Nord's barges. Another potential source of fill material may be other private maintenance dredging in the area. Still another source of fill material could be large scale public or private construction projects which generate exported fill material.

The timetable for placement of fill for the Nord Expansion Project is therefore quite flexible, and will be determined by the availability of acceptable fill material. The Nord Company would like to commence the fill process shortly after all permits have been obtained so as to maximize its potential of receiving fill material from any or all sources.

The fill would create a finished ground elevation of + 15 feet above mean lower low water (MLLW). The fill will be contained on all waterward sides by a retention berm with a top elevation of + 15 feet MLLW. The retention berm is proposed to be composed of approximately 12,700 cubic yards of granular material, with a two foot rock riprap outer surface to protect the fill from wave action. The proposed fill area, together with the existing 3.8 acre upland, will create a total of about 15 acres of new land available for development. The 15 acre expansion area was purchased by the Nord Company in late 1976 in anticipation of this expansion project.

In December, 1976 the E.A. Nord Company submitted an application to the Army Corps of Engineers to fill the 11.2 acres of tideland. That application was later withdrawn. Upon completion of the state and local environmental review process, a new application for the proposed fill will be submitted. This will begin the federal review process for the project.

Construction Phase II

The second phase of the project consists of the expansion of the main factory building, support facilities, and parking area (See Figure 4).

The existing main factory building will be redesigned and reorganized on the interior to create more efficient use of the space. A new 363,600 square foot factory building will be constructed partially on the new fill area. Reinforced concrete piles will be driven into the fill to provide structural support for the building. The new building will be alligned parallel to Norton Avenue and perpendicular to the main production flow in the existing building. This new "L-shaped" configuration will permit the separation of the three major products - doors, louvers and turnings - into three separate production lines. Doors will be made in the new building, with production flowing northward toward finishing and shipping (See Figure 4).

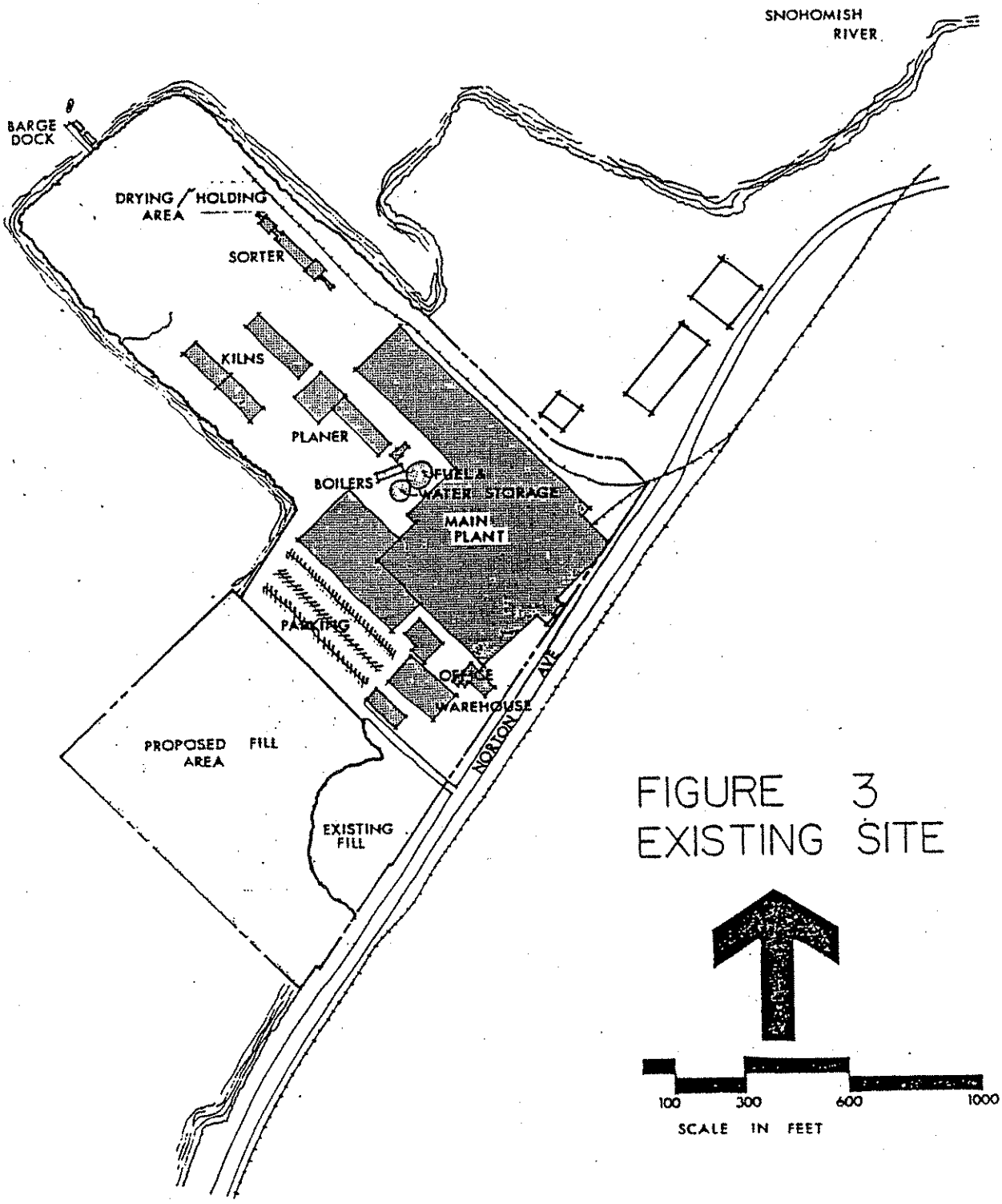


FIGURE 3
EXISTING SITE